

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

TEX MEX ENTERPRISE, INC.

Plaintiff,

v.

ALL-PRO CLEANING SYSTEMS, INC.,

Defendant.

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CLERK'S OFFICE
DISTRICT OF MASS.

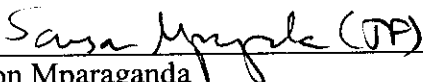
Civil Action No. 05 10518 RCL

**DEFENDANT'S ASSENTED-TO MOTION FOR ORDER STAYING FILING OF
PLEADING OR OTHER RESPONSE TO COMPLAINT PENDING FURTHER ORDER
OF COURT**

Pursuant to Fed. R. Civ. P. 6(a), defendant respectfully moves the court for an order staying the time within which it must plead or otherwise respond with respect to the Complaint pending further order of this court or, in the event that the Parties' Joint Motion to Transfer filed herewith is allowed, pending further order of the transferee court. The grounds for this motion are that the joint motion to transfer is pending; that venue in this court is improper and that there is a valid basis for transfer of venue; and that defendant should not be obligated to plead or respond until the determination of venue has been made. Plaintiff has assented to this motion.

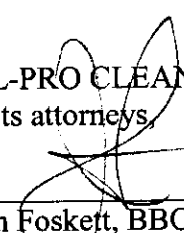
ASSENTED-TO

TEX MEX ENTERPRISE, INC.
By its attorneys,



Samson Mparaganda
MPARAGANDA & ASSOCIATES
15 Alpine Lane, Suite 2
Chelmsford, MA 01824
(978) 256-9152

ALL-PRO CLEANING SYSTEMS, INC.
By its attorneys,

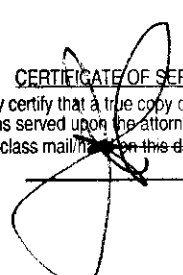


John Foskett, BBO No. 175540
DEUTSCH WILLIAMS BROOKS
DERENSIS & HOLLAND, P.C.
99 Summer Street
Boston, MA 02110-1213
(617) 951-2300

J. Eric Vander Arend
GESSLER, HUGHES, SOCOL, PIERS,
RESNICK & DYM, LTD.
70 West Madison Street
Suite 4000
Chicago, IL 60602

Date: April 14, 2005

DWLIB 179385v1
8715/00



CERTIFICATE OF SERVICE
I hereby certify that a true copy of the above
document was served upon the attorney of record for each
party by first-class mail on this date: _____